

DECLARATION OF ANDREW GRUMBLING

ANDREW GRUMBLING, hereby declares under the penalty of law that the following is true and correct:

1. I am over 18 years of age and reside in Manatee County, FL. I am making this declaration under my own free will.

2. I understand that counsel for HB Productions, Inc. has evidence that I registered for an account with the website YTS using the email address [adgrumbling@gmail.com](mailto:adgrumbling@gmail.com) and used said account to download a torrent file of the motion picture *Hellboy* on 7/20/2019 2:10AM UTC from Internet Protocol address 185.245.86.115 provided by my Virtual Private Network provider Express VPN.


3. I also understand that Fallen Productions, Inc. has evidence that I used the BitTorrent client application "tTorrent" to download and share copies of the motion picture *Hellboy* and the motion picture *Angel Has Fallen* from IP 185.245.86.115 of Express VPN under the file names "Angel Has Fallen (2019) [WEBRip] [1080p] [YTS.LT]" and "Hellboy (2019) [BluRay] [1080p] [YTS.LT]".

4. Without admitting liability, I admit that I did use said email address to login into the YTS website and download said torrent file and used the BitTorrent client application to download the motion pictures while logged into my VPN service provided by Express VPN. I did so without knowing that the torrent files provided by the YTS website were illegal.

5. I understand that the agent for copyright holders has sent infringement notices concerning infringements confirmed at IP address 185.245.86.115 to M247 Ltd. I never received any notice or warning from Express VPN or M247 Ltd. concerning infringing activity. I would have immediately ceased using the BitTorrent client application had I received any of the notices or a warning.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Manatee County, Florida February 17, 2021.

  
ANDREW GRUMBLING  
3539 70th GLE  
Palmetto, FL 34221-7384  
Manatee County